

**IN THE UNITED STATES DISTRICT COURT
FOR THE NOTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDEX SUPPLY CHAIN LOGISTICS §
& ELECTRONICS, INC., §

Plaintiff, §

vs. §

JAMES E. GOODMAN, JR., JOHN §
GOODMAN, JONATHAN GOODMAN, §
JAKE GOODMAN, JOSEPH “JODY” §
GOODMAN, JAMES FRINZI, SHALOM §
AUERBACH, NEIL AUERBACH, §
STEVEN ZAKHARYAYEV, EVALINA §
PINKHASOVA, GENESIS NETWORKS §
TELECOM SERVICES, LLC, GNET §
ATC, LLC, GREATER TECH §
HOLDINGS, INC. f/k/a GOODMAN §
TELECOM HOLDINGS, LLC, §
GOODMAN INVESTMENT §
HOLDINGS, LLC, UNIFIED FIELD §
SERVICES, INC., AMERICAN METALS §
RECOVERY AND RECYCLING, INC. §
a/k/a MBG HOLDINGS, INC., §
MULTIBAND FIELD SERVICES, INC., §
HSB HOLDINGS, LLC f/k/a §
MULTIBAND GLOBAL RESOURCES, §
LLC, AMR RESOURCES, LLC, §
HUDSON CLEAN ENERGY §
ENTERPRISES, LLC, 18920 NW 11th, §
LLC, PROSPERITY BANCSHARES, §
INC., THE FRINZI FAMILY TRUST, §
ALLIANCE TEXAS HOLDINGS, LLC, §
AUERBACH PARTNERS, LP, and §
ONEPATH SYSTEMS, LLC, §

Defendants.

Civil Action No. 3:23-cv-02397

UNOPPOSED MOTION TO EXTEND RESPONSIVE PLEADING DEADLINE
FOR 18920 NW 11th, LLC, STEVEN ZAKHARYAYEV,
& EVALINA PINKHASOVA

Defendants 18920 NW 11th, LLC, Steven Zakharyayev, and Evalina Pinkhasova (together, the “Subject Defendants”) file this Unopposed Motion to Extend Responsive Pleading Deadline and would respectfully show the following.

Plaintiff FedEx Supply Chain Logistics & Electronics, Inc. (“FedEx”) commenced this action against the Subject Defendants and numerous other defendants by filing its Complaint in this Court on October 27, 2023. (ECF 1). Shortly thereafter, the Trustee in a related bankruptcy case commenced an adversary proceeding—Case No. 23-03091-mvl—against FedEx in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (“the Adversary Proceeding”). The Trustee has since asked the Bankruptcy Court to enter a preliminary injunction preventing FedEx from moving forward with this case against the Subject Defendants and others. The Trustee’s Motion for a Preliminary Injunction (“Preliminary Injunction Motion”) remains pending in the Bankruptcy Court.

In light of the above, the Subject Defendants respectfully request an extension of the deadline for them to file an answer, motion, or other document in response to the Complaint to a date 21 days after the Bankruptcy Court enters a final order adjudicating the Preliminary Injunction Motion. FedEx does not oppose this request for relief.

Respectfully submitted,

JORDAN, LYNCH & CANCIENNE PLLC

/s/ Joseph W. Golinkin II

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COUNSEL FOR 18920 NW 11TH, LLC,
STEVEN ZAKHARYAYEV,
& EVALINA PINKHASOVA

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2023, a true and correct copy of the foregoing was served by the Court’s Electronic Case Filing System on all counsel of record.

/s/ Joseph Golinkin

Joseph W. Golinkin II

CERTIFICATE OF CONFERENCE

I hereby certify that on November 29, 2023, I conferred with counsel for FedEx, and they indicated that they were not opposed to the relief requested in this motion.

/s/ Joseph Golinkin

Joseph W. Golinkin II